

The Honorable Kymberly K. Evanson

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JERRY CHANG,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
EDUCATION, OFFICE OF SPECIAL
EDUCATION AND REHABILITATIVE
SERVICES, REHABILITATION SERVICES
ADMINISTRATION; et. al.,

Defendants.

Case No. 2:24-cv-00712-KKE

JOINT STIPULATION AND
ORDER EXTENDING DEADLINE TO
RESPOND TO COMPLAINT

Noted for Consideration:
Today

JOINT STIPULATION

WHEREAS Plaintiff filed an Amended Complaint on September 27, 2024, seeking judicial review under the Administrative Procedure Act of the Department of Education's Rehabilitation Services Administration's decision to deny Plaintiff's request for an exception to his work service obligation under the Rehabilitation Long-Term Training program of the Rehabilitation Act of 1973. Dkt. 15.

WHEREAS the current deadline for Defendants to file a responsive pleading is December 6, 2024. The current deadline to complete the Rule 26(f) conference is December 26,

2024, initial disclosures are currently due January 8, 2025, and a joint status report is currently due by January 5, 2025. Dkt. 18.

WHEREAS the parties have met and conferred and are exploring administrative remedies and settlement options that may resolve Plaintiff's claims and render the issues in this lawsuit moot.

WHEREAS the parties agree that this case should be stayed for two months, until February 4, 2025, to allow the parties sufficient time to explore potential resolution.

NOW THEREFORE, the parties, through their respective counsel of record, do hereby stipulate and agree that the Court may make and enter the following order:

1. This case is stayed until February 4, 2025.

2. The parties shall file a Joint Status Report on or before February 4, 2025 informing the Court of the status of the claims in this lawsuit.

SO STIPULATED.

DATED this 4th day of December, 2024.

LANE POWELL PC

s/ Callie A. Castillo

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Attorney for Plaintiff

1 SO STIPULATED.

2 DATED this 4th day of December, 2024.

3 TESSA M. GORMAN
4 United States Attorney

5 s/ Kristin B. Johnson

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Attorney for Defendants

10 I certify that this memorandum contains 221 words,
11 in compliance with the Local Civil Rules.

12
13 **ORDER**

14 IT IS SO ORDERED.

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16 DATED this 5th day of December, 2024.

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20 **KYMBERLY K. EVANSON**
21 United States District Judge